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June 16, 2020

VIA ECF AND EMAIL

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

PreskaNYSDChambers@nysd.uscourts.gov

**Counsel's request for an extension until
September 8, 2020, is granted. SO ORDERED.**



6/17/2020

RE: *United States v. Rafael Romero*, 88-cr-642 (LAP)

Dear Judge Preska:

I am writing to request an extension until September 8, 2020 of the deadline to make a supplemental submission in further support for Rafael Romero's pro se motion for compassionate release pursuant to 18 U.S.C. § 3582(c)(1)(A). This is my second request for additional time. I have consulted with AUSA Kaylan Lasky, and the Government consents to this request.

I have been actively investigating the merits of Mr. Romero's application. My work is complicated because Mr. Romero, and his family and others, do not speak English. I do not speak Spanish. Thus, all communications need to be translated. Additionally, Mr. Romero's application has necessitated a review of trial documents, some of which I have received from the Government; others may have to be retrieved from the court archives. These factors, plus the limitations imposed by the COVID-19 pandemic on my ability to confer with Mr. Romero, compel me to request more time so that I can be able to provide adequate counsel to Mr. Romero.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow